

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	:	
	:	
	:	<b>Hon. Robert B. Kugler</b>
	:	
	:	<b>Civil No. 1:19-md-2875-RBK-</b>
<b>This Document Relates to:</b>	:	<b>JS</b>
	:	
<i>All Actions</i>	:	
	:	

**DECLARATION OF JESSICA M. HEINZ**

I, Jessica M. Heinz, of full age, hereby declare as follows:

1. I am an attorney of the State of New Jersey, New York, and Pennsylvania, a member of good standing of the bar, and am employed with the law firm Cipriani & Werner PC, counsel to the Aurobindo Defendants.

2. I make this Declaration on behalf of the Aurobindo Defendants in support of their Response in Opposition to Plaintiffs' Motion to Strike and Suppress All of Aurobindo's Defenses.

3. Attached hereto as Exhibit 1 is a true and correct copy of an email sent by Marlene Goldenberg on February 19, 2021.

4. Attached hereto as Exhibit 2 is a true and correct copy of an email sent by Marlene Goldenberg on February 2, 2021.

5. Attached hereto as Exhibit 3 is a true and correct copy of a letter sent by me on November 13, 2019.

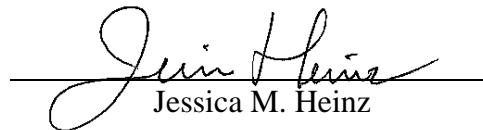
6. Attached hereto as Exhibit 4 is a true and correct copy of an email sent by me on May 3, 2021.

7. Attached hereto as Exhibit 5 is a true and correct copy of an email sent by Ernest Koschineg on April 26, 2021.

8. Attached hereto as Exhibit 6 is a true and correct copy of an email sent Marlene Goldenberg on April 14, 2021.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.

EXECUTED: May 7, 2021

  
Jessica M. Heinz